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**ENERGY**

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# INFORMATION Management Conference

*Raising the Bar... Seeking Innovative Solutions for Tomorrow's Challenges*



# A SIMPLE PLAN FOR E-MAIL MANAGEMENT

“Big Bucket Lite” with a Dash of  
Role and Rule Based Retention

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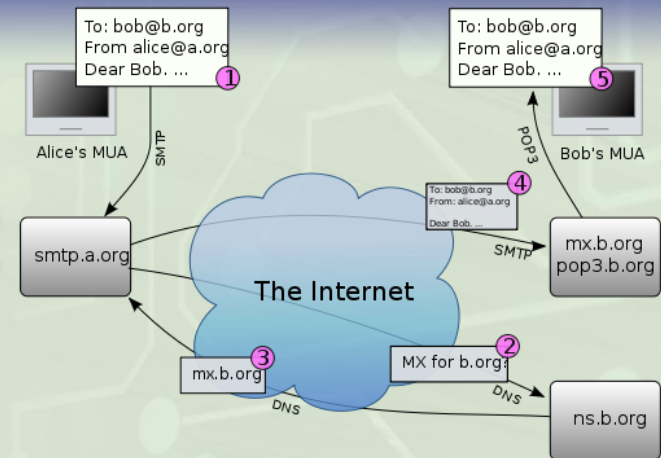
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# Scope of the Presentation

- ▣ Overview
- ▣ E-Mail and How it is Used
- ▣ What is a Record?
- ▣ Policies and Practices
- ▣ Requirements for Retention
- ▣ What are Transitory E-Mail Records
- ▣ Concerns for Retention of Electronic Format Content
- ▣ Proposal for Managing Retention by Use of “Big Buckets”
- ▣ Examples of Functional Buckets
- ▣ Role and Rule Based Retention
- ▣ Questions

# Overview Of the Concept

- Intent of Presentation
- Not Intended to Address Use of E-Mail
- Proposed Methodology, NOT a Solution
- How E-Mail and Records are Related
- Considerations for Improving Practices
- Evaluation of Concerns and Problems
- Review of Requirements and Expectations
- Proposals to Consider in Your Environment





# E-Mail and How it is Used

- De-Facto method of communications today
- Everyone uses it, but not the same way
- When communications are “informal”
- When communications are “formal”
- Why does it matter?
- Examine policies opposed to practices



# Polices Opposed to Practices

- ▣ Perspective given here is meeting RM requirements
- ▣ Each organization *should have a policy*
  - ▣ Describes use of e-mail, requirements for retention
  - ▣ How to determine record status
  - ▣ Need for a clear, concise subject line
  - ▣ What to attach and how to manage attachments
  - ▣ Understanding that e-mail content can have legal implications
  - ▣ May be subject to FOIA or Discovery in a legal action
- ▣ Practices should address how policies are met
  - ▣ Less formal in nature, more procedural based
- ▣ IT practices as opposed to RM policies
  - ▣ Retention of e-mail based on content is required, not optional
  - ▣ Arbitrary volume and/or time limits do not satisfy requirements



# What is a Record?

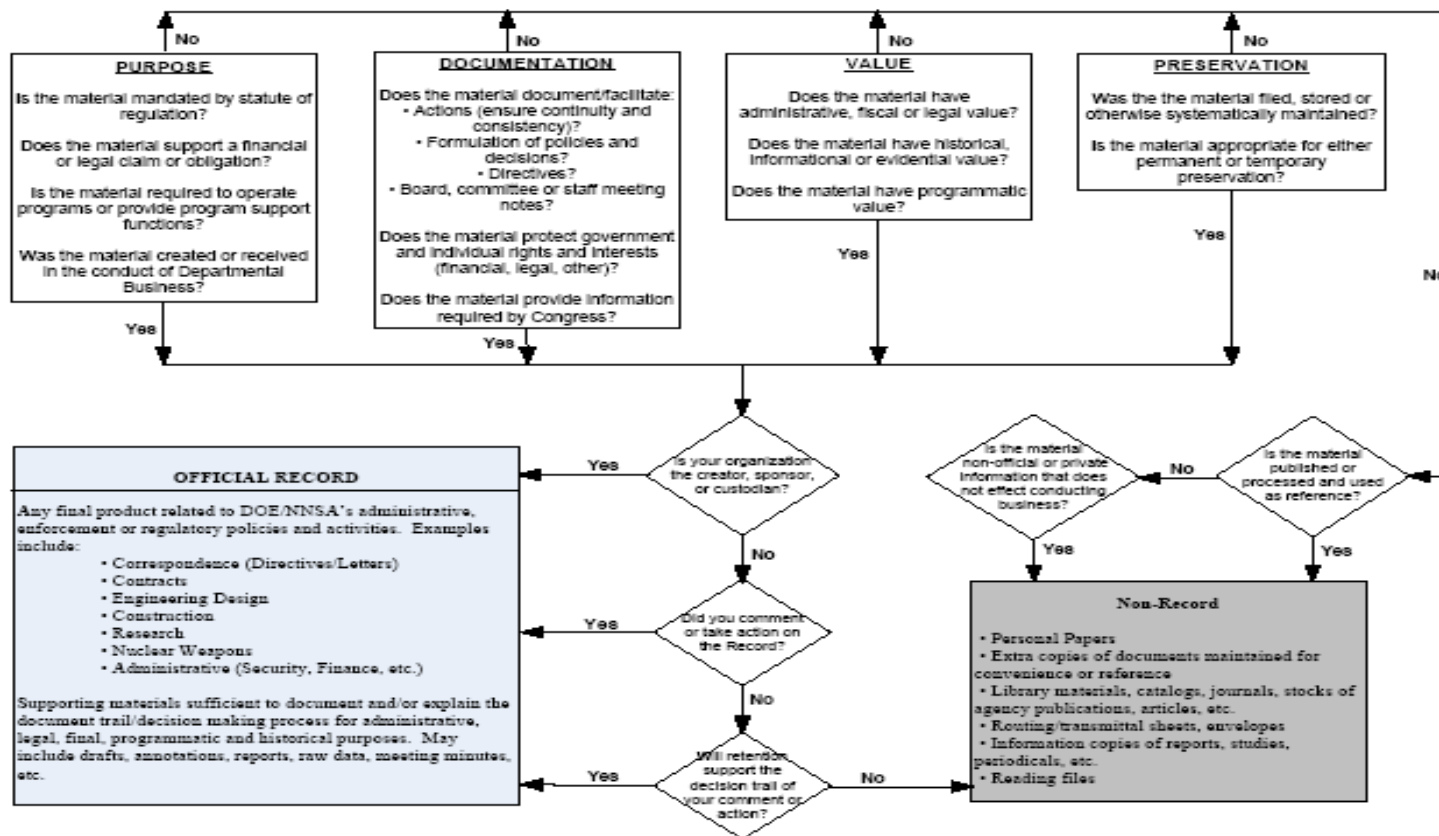


- Empirically: Anything that documents or is a by-product of an activity, retained because of its relevance to the activity
- Formally: Recorded information made or received during the course of agency business or under law
  - Regardless of medium, form, or format
  - Kept because it:
    - Provides evidence of organization, functions, policies, decisions, procedures, operations, or other activities of their creators, or it contains valuable information



□ *Derived from 44 U.S.C. 3301*

# NNSA What is a Record?





# Requirements for Retention

- ▣ Retention requirements come from NARA, and are described in 36CFR (*Part 1228, Subpart B*)
  - Retention is based on the CONTENT of a record, not the form it is generated in
- ▣ E-mail is a method of delivery of information
  - There is no single retention period for e-mail as a category or record series
- ▣ 36CFR provides guidance that must be met for managing e-mail (*Part 1234*)
- ▣ External e-mail (if used for business purposes) must be captured and retained (*36CFR 1234.24 (4)*)



# Requirements for Retention (cont'd)

- ▣ E-mail meeting the definition of a record *must be moved* from the native application to an electronic records management (ERM) application (36CFR 1234.24 (6)(c))
  - ▣ All transmission/receipt information must be retained
  - ▣ Nicknames must be expanded, or a list must be managed
  - ▣ Messages must be able to be grouped by series
  - ▣ Must be in a format accessible for the required retention
- ▣ Don't forget the Attachments!
- ▣ If an ERM is not available, e-mail must be printed and retained in paper form, including all receipt and transmission data (metadata) (36CFR 1234.24 (6)(c))



# What are Transitory E-Mail Records



## NARA Definition

- ▣ Records of short term (180 days or less) interest, including email, which have minimal or no documentary or evidential value
  - Examples include: Routine requests for info or publications, copies of replies which require no administrative action or policy decision, or are not related to special research. This also extends to quasi official notices or memos that do not serve as a basis for official actions, such as holiday notices or the documentation of activities that contain no substantive information
- ▣ *(Policy Change, Feb 2006)*

NARA final regulations published in the Federal Register on February 21, 2006 (71 F.R. 8806) Email records appropriate for preservation for less than 180 days may be managed on live email systems and allowed to be deleted as part of automatic processes, without an end user further needing to print out or electronically archive





# Concerns for Retention of Electronic Format Content

- ▣ As technologies change, some content may no longer remain accessible
  - Formats may no longer be supported
  - Media may become obsolete or degrade
  - Environmental issues may impact media
  - Magnetic fields or static can damage electronically stored information
  - Data can become corrupted when migrated or converted





# Proposal for Managing E-mail Retention by Use of “Big Buckets”

- ▣ Aggregation of content, commonly referred to as “Flexible Scheduling” or “Big Bucket” schedules are being considered  
(NARA Bulletins 2005-05, 2008-04)
- ▣ Retention periods are being re-evaluated across all Federal Agencies internally with the help of NARA
- ▣ This presentation is a similar concept, but rather than being used across a schedule, it is being proposed for use for e-mail based on its *functional* value
- ▣ Think about the e-mail you personally send and receive on a daily or weekly basis



# How to Determine What Goes in Each Bucket



- ▣ On an individual basis, this can be a complex task
  - ▣ Data needs to be captured to determine the mix of messages sent and received, and functions they are related to
- ▣ Users are most familiar with their activities and can typically group content into a limited number of categories (<10)
  - ▣ Categories are all related to functions, and reviewing the retention schedule assists in determining the periods for the buckets
- ▣ Typically this results in between 3 and 6 retention periods
  - ▣ More on this for departments or work groups in a later slide

# Worksheet Example

CATEGORY OF MESSAGE	SA	SU	M	T	W	TH	FR
Listserve subscribed to							
Vendor/Other Subscriptions							
Unsolicited Junk (not caught by filter)							
Unsolicited Junk (caught by filter)							
Personal e-mail							
Business e-mail, non-record							
Business e-mail, record requiring action							
<b>TOTAL</b>							
(Of the total, number for immediate disposal)							
<b>RETENTION REQMT FOR BUSINESS RECORDS</b>							
180 day max							
CY+2yr							
CY+up to 7yr							
CY+ over 25yr							
<b>TOTAL</b>							

# Example of Weekly Activity

(353 messages, 93% non-record)

CATEGORY OF MESSAGE	Sat-Sun	%	Mon	%	Tues	%	Wed	%	Thurs	%	Fri	%	Total	%
Listservs subscribed to	6	0.18	35	0.49	26	0.30	32	0.42	13	0.16	9	0.24	115	0.33
Vendor/Other Subscriptions	7	0.21	9	0.13	7	0.08	7	0.09	9	0.11	3	0.08	35	0.10
Unsolicited Junk (not caught by filter)	2	0.06	19	0.26	21	0.24	26	0.34	34	0.42	15	0.41	115	0.33
Unsolicited Junk (caught by filter)	18	0.53	2	0.03	6	0.07	8	0.10	8	0.10	2	0.05	26	0.07
Personal e-mail	0	0.00	2	0.03	3	0.03	2	0.03	5	0.06	0	0.00	12	0.03
Business e-mail, non-record	0	0.00	4	0.06	16	0.19	2	0.03	6	0.07	3	0.08	31	0.09
Business e-mail, record requiring action	1	0.03	1	0.01	7	0.08	0	0.00	6	0.07	5	0.14	19	0.05
<b>TOTAL</b>	<b>34</b>		<b>72</b>		<b>86</b>		<b>77</b>		<b>81</b>		<b>37</b>		<b>353</b>	
<b>(Of the total, number for immediate disposal)</b>	<b>33</b>	<b>0.97</b>	<b>71</b>	<b>0.99</b>	<b>78</b>	<b>0.91</b>	<b>77</b>		<b>73</b>	<b>0.90</b>	<b>30</b>	<b>0.81</b>	<b>329</b>	<b>0.93</b>
<b>RETENTION REQMT FOR BUSINESS RECORDS</b>														
180 day max	0	0.00	0	0.00	1	0.13	0	#####	5	0.63	2	0.29	8	0.33
CY+2yr	0	0.00	1	0.01	1	0.13	0	#####	0	0.00	0	0.00	2	0.08
CY+up to 7yr	0	0.00	0	0.00	0	0.00	0	#####	0	0.00	0	0.00	0	0.00
CY+ over 25yr	1	1.00	0	0.00	6	0.75	0	#####	3	0.38	5	0.71	14	0.58
<b>TOTAL</b>	<b>1</b>	<b>0.03</b>	<b>1</b>	<b>0.01</b>	<b>8</b>	<b>0.09</b>	<b>0</b>	<b>0.00</b>	<b>8</b>	<b>0.10</b>	<b>7</b>	<b>0.19</b>	<b>24</b>	<b>0.07</b>



# Example of Monthly Activity

*(1044 messages, 92% non-record)*

CATEGORY OF MESSAGE	Week 1	%	Week 2	%	Week 3	%	Week 4	%	Week 5	%	Total, January 2008	%
Listserve subscribed to	20	0.50	150	0.42	115	0.33	84	0.30	2	0.17	371	0.36
Vendor/Other Subscriptions	5	0.13	22	0.06	35	0.10	34	0.12	3	0.25	99	0.09
Unsolicited Junk (not caught by filter)	15	0.38	106	0.30	115	0.33	105	0.37	7	0.58	348	0.33
Unsolicited Junk (caught by filter)	0	0.00	20	0.06	26	0.07	16	0.06	0	0.00	62	0.06
Personal e-mail	0	0.00	7	0.02	12	0.03	12	0.04	0	0.00	31	0.03
Business e-mail, non-record	0	0.00	11	0.03	31	0.09	12	0.04	0	0.00	54	0.05
Business e-mail, record requiring action	0	0.00	40	0.11	19	0.05	20	0.07	0	0.00	79	0.08
<b>TOTAL</b>	<b>40</b>		<b>356</b>		<b>353</b>		<b>283</b>		<b>12</b>		<b>1044</b>	
<b>(Of the total, number for immediate disposal)</b>	<b>40</b>	<b>1.00</b>	<b>316</b>	<b>0.89</b>	<b>329</b>		<b>263</b>	<b>0.93</b>	<b>12</b>	<b>1.00</b>	<b>960</b>	<b>0.92</b>
<b>RETENTION REQMT FOR BUSINESS RECORDS</b>												
180 day max	0	#####	6	0.15	8	0.33	0	0.00	0	#####	14	0.17
CY+2yr	0	0.00	8	0.20	2	0.08	4	0.20	0	#####	14	0.17
CY+up to 7yr	0	#####	3	0.08	0	0.00	2	0.10	0	#####	5	0.06
CY+ over 25yr	0	#####	23	0.58	14	0.58	14	0.70	0	#####	51	0.61
<b>TOTAL</b>	<b>0</b>	<b>0.00</b>	<b>40</b>	<b>0.11</b>	<b>24</b>	<b>0.07</b>	<b>20</b>	<b>0.07</b>	<b>0</b>	<b>0.00</b>	<b>84</b>	<b>0.08</b>

The high volume of CY+>25yr files is due to Termination, Transfer, Separation, Leave Checklist received

# Examples of Functional E-mail Buckets



- **Non-Record**
  - Non-records should be discarded as soon as practical, not to exceed 30 days
- **Transitory Record**
  - Transitory records should be moved to a folder with retention not to exceed 180 days
  - In both cases, the messages can remain in the native e-mail system
- **Record of Short Term Value (CY plus up to 3 yrs)**
  - Records should be moved to an ERM folder with retention of CY+3, evaluated prior to expiration for potentially longer value, then moved again
- **Record of Long Term Value (>3yrs up to 25yrs)**
  - Records should be moved to an ERM folder with retention of CY+25, evaluated prior to expiration for potentially longer value, then moved again
- **Permanent Record**
  - Records should be moved to an ERM into a folder with retention of Permanent

# Role and Rule Based Retention

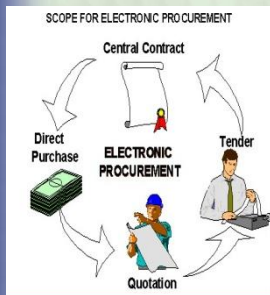
- Not a new process, but something that may have value when it comes to e-mail
- A combination of functional and organizational scheduling, combined with defined retention periods
  - Success dependent upon individuals in the organization serving similar roles, working in the same functional area (*role*)
  - Buckets based on maximum retention period related to the most commonly performed functions (*rule*)
- Works well with an ERM, but can also manually applied at the desktop
- Initial step- Determine e-mail meets criteria of a record
  - IF NOT, handle as non-record or Transitory Record





# Role and Rule Based Retention Examples

## Procurement (Function)



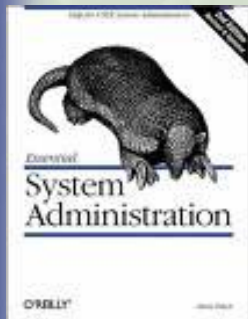
- (Role) Individuals assigned to issue purchase agreements and contracts in excess of \$2,000

(Rule) Destroy 6y3m after final payment *DOE ADM Sch3, Item 3a1a*

- (Role) Individuals assigned to issue purchase agreements and contracts not to exceed \$2,000

(Rule) Destroy 3y after final payment *DOE ADM Sch3, Item 3a1b*

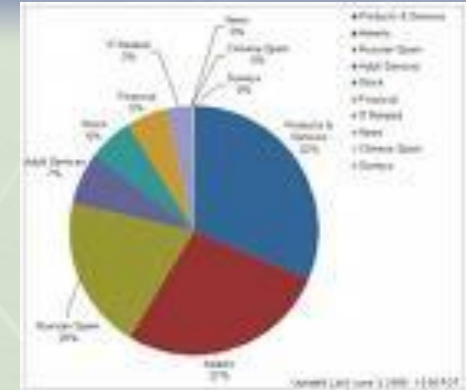
## Administrative (Function)



- (Role) Individuals assigned to process routine admin files for other than Senior Officials
- (Rule) Destroy after 2y *DOE Adm Sch23, Items 1a, 5a, 8*
- (Role) Individuals assigned to process routine admin files for Senior Officials
- (Rule) Permanent *DOE Adm Sch23, Items 1b, 5.1a*



# How to Implement Role/Rule Based Practices



## Procurement

- All RECORD e-mail for employees handling transactions under \$2000, retain for 3 years
- All RECORD e-mail for employees handling transactions over \$2000, retain for 6 years, 3 months

## Administrative



- All RECORD e-mail for employees handling transactions under \$2000, retain for 3 years
- All RECORD e-mail for employees handling transactions over \$2000, retain for 6 years, 3 months
- **All RECORD e-mail for Senior Officials, retain Permanently**

# Alternative? A Combination of the Two Practices



- What about the best of both worlds?
- Retain all Procurement and Administrative e-mails for 7 years *(for non-Senior Officials)*
  - Some records would be held longer than required, but they would be categorized for retention and could be re-evaluated later
- Give consideration to potential risk for longer than required retention and weigh that against the cost of assigning individual retention periods, or 'keeping everything'
  - Typical IT practices are to keep everything indefinitely or discard chronologically (90-180 days) or establish a volume limit (3-5gb)
  - Assigning retention periods to each message based on subject content manually is labor intensive and requires training to identify content-to-series relationships

# Things to Consider

- ▣ What are you doing now?
  - ▣ What does it cost you?
  - ▣ What are the risks?
  - ▣ Could either of these proposed practices benefit your organization?
- 
- 
- ▣ Would this assist in controlling e-mail volume until you develop a more effective solution?
  - ▣ Potential legislation- HR 5811

# Is this RIGHT for Your Situation?

- ▣ E-mail volume is growing astronomically
  - ▣ Separating non-record from record e-mail can result in a serious reduction in the volume you need to manage
- ▣ Doing nothing is really NOT an option
  - ▣ Setting arbitrary volume/time limits is worse
- ▣ Minimize your risk, improve your efficiency
  - ▣ Establish a policy; train your users
- ▣ Get involved with IT prior to evaluation of changes to practices and systems
- ▣ Don't forget your Attachments!
  - ▣ Managing them WITH the e-mail isn't always a good idea; after they are downloaded, they may be revised





# Links to Resources

*(Handout available)*

## URLs for Items in the Presentation

- NNSA "What is a Record?" Decision Chart  
<http://snipurl.com/bp9qn>
- NARA 36CFR, Part 1228, Subpart B "Scheduling Records"  
<http://www.archives.gov/about/regulations/part-1228/b.html>
- NARA 36CFR, Part 1234, "Electronic Records Management"  
(see 1234.24 for E-Mail)  
<http://www.archives.gov/about/regulations/part-1234.html>
- NARA Bulletin 2005-05, "Flexible Scheduling"  
<http://www.archives.gov/records-mgmt/bulletins/2005/2005-05.html>
- NARA Bulletin 2008-04 "Big Bucket " Flexible Scheduling"  
<http://www.archives.gov/records-mgmt/bulletins/2008/2008-04.html>
- Department of Energy Administrative Schedules  
<http://cio.energy.gov/records-management/adminrs.htm>
- CREW Report "Deplorable State of Electronic Record Keeping in the Federal Government"  
<http://www.citizensforethics.org/recordchaos>

## Standards and Guidance for Managing Electronic Messages

<http://www.arma.org/standards/ElectronicMessages.cfm>

## Potential Legislation (HR 5811)

<http://oversight.house.gov/documents/20080416155258.pdf>

## Examples of Electronic Communications /E-Mail Polices

- [University of California, Office of the President](http://www.ucop.edu/ucophome/coordrev/policy/PP081805ECP.pdf)  
<http://www.ucop.edu/ucophome/coordrev/policy/PP081805ECP.pdf>
- [University of Colorado](https://www.cu.edu/policies/General/email.html)  
<https://www.cu.edu/policies/General/email.html>

# Questions

